

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

<p>KHAN M. HASAN, Individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>TWITTER, INC., JACK DORSEY, and NED SEGAL,</p> <p style="text-align: right;">Defendants.</p>	<p>Case No.: 4:19-cv-07149-YGR</p> <p>STIPULATION AND [PROPOSED] ORDER APPOINTING CO-LEAD PLAINTIFFS AND APPROVING CO-LEAD COUNSEL</p> <p><u>CLASS ACTION</u></p> <p>Date: February 4, 2020 Time: 2:00 p.m. Judge: Hon. Yvonne Gonzalez Rogers Courtroom: 1 – 4th Floor</p>
<p>KHAFRE BARCLIFT, Individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>TWITTER, INC., JACK DORSEY, and NED SEGAL,</p> <p style="text-align: right;">Defendants.</p>	<p>Case No.: 4:19-cv-07992-YGR</p> <p><u>CLASS ACTION</u></p>

Pursuant to Civil L.R. 7-12, the undersigned parties, by and through their respective counsel, hereby stipulate as follows:

WHEREAS, the statutory deadline to seek appointment as Lead Plaintiff in the above-captioned actions (the “Related Actions”) pursuant to Exchange Act Section 21D(a)(3)(B), as amended by the

1 Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4(a)(3)(B), was December
2 30, 2019;

3 WHEREAS, the following putative class members filed motions that day seeking appointment as
4 Lead Plaintiff and approval of their respective selections of Lead Counsel: (i) the Weston Family
5 Partnership LLLP (the "Weston Family Partnership") (ECF. No. 28); (ii) Thomas Do, Michael J. Conroy,
6 and Richard Slepko (the "Twitter Investor Group") (ECF. No. 31); and (iii) Hakam Altohol ("Altohol")
7 (ECF. No. 26);

8
9 WHEREAS, pursuant to Civil L.R. 7-3(a), any oppositions to the foregoing motions were due to
10 be filed on January 13, 2020;

11 WHEREAS, on January 8, 2020, due to a clerical error, a notice was erroneously filed stating that
12 the Weston Family Partnership did not oppose the competing motions before the Court (ECF. No. 35);

13
14 WHEREAS, on January 10, 2020, Altohol filed a notice of non-opposition to the competing
15 motions (ECF. No. 36);

16
17 WHEREAS, on January 13, 2010, the Twitter Investor Group filed a notice that its motion was
18 unopposed (ECF No. 37);

19
20 WHEREAS, also on January 13, 2020, upon discovery of the aforementioned clerical error, the
21 Weston Family Partnership withdrew its statement of non-opposition (ECF. No. 38) and filed a
22 memorandum of law in further support of its own appointment and in opposition to the appointment of
23 the Twitter Investor Group (the "Opposition Brief") (ECF. No. 39);

24
25 WHEREAS, its counsel having communicated with the Twitter Investor Group's counsel, the
26 Weston Family Partnership's concerns stated in its Opposition Brief regarding the Twitter Investor
27 Group's adequacy within the meaning of Rule 23 have been addressed and the Twitter Investor Group's
28 concerns regarding the Weston Family Partnership's counsel's clerical error have similarly been
addressed;

1 WHEREAS, as required by the PSLRA, both the Weston Family Partnership and the Twitter
 2 Investor Group have: (i) alleged significant financial interests in this litigation; and (ii) made a *prima*
 3 *facie* showing that they satisfy the adequacy and typicality requirements of Rule 23;

4 WHEREAS, on January 21, 2020, Weston Family Partnership and the Twitter Investor conducted
 5 a conference call and agreed that the interests of the putative class will be best served by a combined
 6 group, utilizing the resources of both movants and their respective selections of counsel—for the Weston
 7 Family Partnership, Pomerantz LLP (“Pomerantz”), and for the Twitter Investor Group, Kaplan Fox &
 8 Kilsheimer LLP (“Kaplan Fox”) and Levi & Korsinsky, LLP (“Levi & Korsinsky”);

10 WHEREAS, the Weston Family Partnership and the Twitter Investor Group agreed to work
 11 together to supervise the conduct of this litigation by their counsel, to ensure that counsel coordinate
 12 appropriately to avoid any duplication of effort in the conduct of the litigation, and to obtain the best
 13 possible outcome for the putative class of investors;

15 IT IS HEREBY STIPULATED, that subject to the Court’s approval, the Weston Family
 16 Partnership and the Twitter Investor Group agree to serve as Co-Lead Plaintiffs in the Action, with their
 17 respective choices of counsel, Pomerantz and Kaplan Fox, serving as Co-Lead Counsel, and Levi &
 18 Korsinsky serving as additional counsel for the putative Class. Pomerantz, Kaplan Fox, and Levi &
 19 Korsinsky shall maintain contemporaneous billing records of all time spent litigating the case and shall
 20 provide the Court with updates as to such billing as the Court may instruct. No other law firms shall
 21 work on this action for the putative class without prior approval of the Court.

23 Respectfully submitted,

25 POMERANTZ LLP

26 Dated: January 21, 2020

27 /s/ Jennifer Pafiti
 28 Jennifer Pafiti (SBN 282790)
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*Counsel for the Weston Family Partnership
LLLP and Proposed Co-Lead Counsel for the
Class*

Dated: January 21, 2020

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*Counsel for the Twitter Investor Group and
Proposed Co-Lead Counsel for the Class*

Dated: January 21, 2020

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE

I hereby certify that on January 21, 2020, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System

/s/ Jennifer Pafiti

Jennifer Pafiti